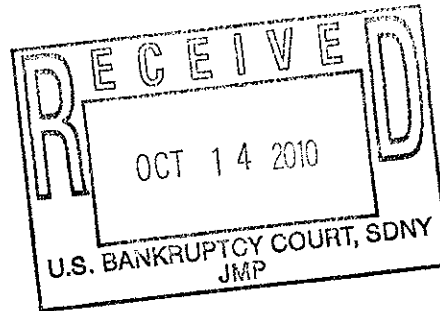


CAJA DE CREDITO DE LOS INGENIEROS, SCC
Attn: Joan Cavallé
Via Laietana, 39
Barcelona, Spain 08003
Telephone: +34 268 2929
Email: asesoriajuridica@caja-ingenieros.es

*Attorney-in-fact to the Spanish Holders of
Lehman Programs Securities
(as identified herein)*



**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

_____)	
In re)	Chapter 11
)	
LEHMAN BROTHERS HOLDINGS, INC.,)	Case No. 08-13555 (JMP)
<i>et al.</i> ,)	
)	(Jointly Administered)
Debtors.)	
_____)	

**OPPOSITION TO DEBTORS' FORTY-SECOND OMNIBUS OBJECTION TO CLAIMS (LATE-FILED
CLAIMS)**

Certain holders of Lehman Programs Securities, namely Lehman Programs Securities with ISIN XS0215349357 issued by LB Capital Funding LP (the "LB Capital Funding Securities") and Lehman Programs Securities with ISIN XS0310125546 issued by LB Treasury Co. BV (the "LB Treasury Securities") the holders on whose behalf this opposition is filed are collectively referred to herein as the "Spanish Holders of Lehman Programs Securities" and the Lehman Programs Securities to which each such holder's claim relates are listed in Exhibit A, by their undersigned attorney-in-fact, a representative of Caja de Credito de los Ingenieros, hereby file their Opposition to Debtors' Forty-Second Omnibus Ojection to Claims (Late-Filed Lehman Programs Securities Claims) (the "Objection"), as set forth below.

I. PRELIMINARY STATEMENT

On September 13, 2010, Lehman Brothers Holdings Inc. and certain of its affiliates (collectively, the "Debtors") filed their Objection. In the Objection, the Debtors incorrectly seek to disallow and expunge

the claims filed by the Spanish Holders of Lehman Programs Securities against Lehman Brothers Holdings Inc. on the grounds that the claims fail to comply with the Bankruptcy Court's July 2, 2009 order setting forth the procedures and deadlines for filing proofs of claim in the Chapter 11 case (the "Bar Date Order") on the basis that they were filed after the November 2, 2009 bar date established for Lehman Programs Securities in the Bar Date Order. The Spanish Holders of Lehman Programs Securities hereby assert that their claims were timely filed and should be allowed.

II. BACKGROUND

The Spanish Holders of Lehman Programs Securities filed their claims through their attorney-in-fact, a representative of Caja de Credito de los Ingenieros, and correspondingly their proofs of claim forms were sent to the United States from Barcelona, Spain, in two packages.

The first package contained the claims related to the LB Capital Funding Securities. These claims were addressed to Lehman Brothers Holdings Claims Processing Center, c/o EPIQ Bankruptcy Solutions, FDR Station P.O. Box 5076, New York. The package was sent by courier and the courier company attempted to make delivery to the above-stated address but was not able to because it is a post office box. The courier instead delivered the package to Lehman Brothers Holding, 101 Hudson St., Jersey City, NJ 07302. The package was delivered and signed for on October 23, 2009 at 12:16 PM, as shown in Exhibit B.

The second package contained the claims related to the LB Treasury Securities. These claims were posted after the first package had been delivered to the abovementioned address in New Jersey. As the first package had been redirected to that address and signed for, the second package was couriered directly to that address. This package was delivered and signed for on October 26, 2009 at 11:03 AM, as shown in Exhibit C.

III. OPPOSITION TO THE OBJECTION

In their Objection, Debtors assert that the claims of the Spanish Holders of Lehman Programs Securities were not timely filed. However, both packages reached a Lehman Brothers address prior to the

bar date of November 2, 2009. Upon discovery that the packages had been delivered to the incorrect address, Caja de Credito de los Ingenieros and its legal advisors placed a call to EPIQ. The situation was explained, and EPIQ confirmed that the claims would be sent from the New Jersey address to the appropriate address for EPIQ and that they would be accepted by EPIQ as if received by EPIQ on their respective dates of delivery to Lehman Brothers.

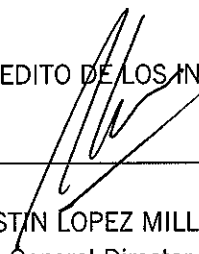
Therefore, although the claims were registered into EPIQ's system after the bar date, they should be considered timely filed because they were delivered and signed for at a Lehman Brothers address prior to the bar date and in reliance on EPIQ's assurance that the Spanish Holders of Lehman Programs Securities need take no further action, as the proofs of claim would be forwarded on to EPIQ with the understanding that they would be considered timely filed. Pursuant to the principle underlying Rule 5005(c) of the Federal Rules of Bankruptcy Procedure, we assert that it would not be in the interests of justice for the Objection to be upheld and it may be ordered that these claims be deemed filed with the clerk as of the date of their original delivery.

IV. REQUESTED RELIEF

Based on the foregoing, the Spanish Holders of Lehman Programs Securities respectfully request that the Court overrule the Debtors' Forty-Second Omnibus Objection to Claims (Late-Filed Claims) with respect to their claims and deem their claims to have been filed as of the date of their original delivery.

Dated: 10/11/2010

CAJA DE CREDITO DE LOS INGENIEROS, SCC

By:  _____

Name: AGUSTIN LOPEZ MILLAN

Title: Deputy General Director

Attorney-in-fact for the Spanish Holders of Lehman
Programs Securities

EXHIBIT A **Spanish Holders of Lehman Programs Securities**

Claim Number	ISIN	Issuer	Last Name	First Name	Additional Party	Original Claim Amount
64228	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Gine Davi	Jose	M ^a Caridad Roger Planas	USD 28,942.94
64227	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Fernandez Tremps	Adolfo	M ^a Vicenta Ortega Ordovas	USD 50,650.14
64226	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Mateilanes Marin Mateos	Jose M.	Mercedes de Azpiazu Gelabert	USD 28,942.94
64133	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Herrero Moro	M ^a del Milagro	Pedro Hernandez del Santo	USD 72,357.34
64132	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Vila Despujol	Miguel	Carmen Gritoll de la Esperanza	USD 36,178.67
64131	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Gonzalez Alvarez	Eleuterio	M ^a Mercedes Gasch Riudor	USD 43,414.41
64130	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Gonzalez Gasch	Esteban		USD 28,942.94
64129	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Gonzalez Gasch	Helena		USD 28,942.94
64128	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Gonzalez Gasch	Mercedes		USD 28,942.94
64127	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Ortol de Mingo	Manuel	Mercedes Biraube Cortes	USD 43,414.41
64204	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Garcia-Mila Palaudarias	Jaimé	Rosa M. Mateu Sole	USD 14,471.47
64203	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Juanais Garcia	Juan	Anna Belvehí Soler	USD 72,357.34
64202	XS0215349357	Lehman Brothers Capital Funding LP (UK)	Hijos Raubert	Esteban	M ^a Jesús Gago Moreda	USD 43,414.41
64899	XS0310125546	Lehman Brothers Treasury Co. BV	Villanueva Toran	Jose Enrique		USD 70,875.00
64898	XS0310125546	Lehman Brothers Treasury Co. BV	Bertran Alcalde	Jose		USD 70,875.00
64897	XS0310125546	Lehman Brothers Treasury Co. BV	Soler Linares	Jesús		USD 70,875.00
64896	XS0310125546	Lehman Brothers Treasury Co. BV	Sanglas Camps	Javier		USD 70,875.00
64895	XS0310125546	Lehman Brothers Treasury Co. BV	Aiax Idoate	Fernando		USD 70,875.00
64894	XS0310125546	Lehman Brothers Treasury Co. BV	Gonzalez Alvarez	Eleuterio	M ^a Mercedes Gasch Riudor	USD 70,875.00
64852	XS0310125546	Lehman Brothers Treasury Co. BV	Redon Castaner	Antonio		USD 70,875.00
64850	XS0310125546	Lehman Brothers Treasury Co. BV	Amatiz Lopez	Aida Maria		USD 70,875.00
64851	XS0310125546	Lehman Brothers Treasury Co. BV	Ramiro Fernandez	Adolfo		USD 70,875.00
64900	XS0310125546	Lehman Brothers Treasury Co. BV	Jove Vintro	Jose L.		USD 70,875.00
64901	XS0310125546	Lehman Brothers Treasury Co. BV	Latiente Bel	Jose Luis	M. Carmen Caminals Rosell	USD 70,875.00
64903	XS0310125546	Lehman Brothers Treasury Co. BV	Perez Ruiz de Torres	Juan Jose		USD 70,875.00
64902	XS0310125546	Lehman Brothers Treasury Co. BV	Pedraza Llanos	Jose Luis		USD 70,875.00
64904	XS0310125546	Lehman Brothers Treasury Co. BV	Sanmarti Aulet	Juan M.	Maria Antonia Bosch Mallada	USD 70,875.00
64905	XS0310125546	Lehman Brothers Treasury Co. BV	Sanchez Latiente Mariol	Juana M.	Jose Asto Rull	USD 70,875.00
64906	XS0310125546	Lehman Brothers Treasury Co. BV	Gallen Raliu	Lidia		USD 70,875.00
64907	XS0310125546	Lehman Brothers Treasury Co. BV	de Aguirre Torres	Maria Concepcion		USD 70,875.00
64908	XS0310125546	Lehman Brothers Treasury Co. BV	Albarada Costa	Maria Jose		USD 70,875.00
64911	XS0310125546	Lehman Brothers Treasury Co. BV	Subira Farré	Pedro J	Ramona Serentill Llovera	USD 141,750.00
64910	XS0310125546	Lehman Brothers Treasury Co. BV	Sanz Garetá	Maria Teresa		USD 70,875.00
64909	XS0310125546	Lehman Brothers Treasury Co. BV	Cabre Rabada	Maria Montserrat	Encarnacion Cabre Rabada	USD 70,875.00
64912	XS0310125546	Lehman Brothers Treasury Co. BV	Garcia-Torrent Molina	Ramon		USD 70,875.00
64913	XS0310125546	Lehman Brothers Treasury Co. BV	Aguilera Caeles	Vicente		USD 70,875.00

EXHIBIT B

SPA1INA:000A0000

SHIPPER	PKG	TRACING	NUMBER	ADDRESS	SIGNATURE
ASDASD	497	H7278432497	HUDSON ST 101 JERSEY CITY		

According to our records 1 parcel was delivered on 23/10/09 at 12:16 P.M.. The shipment was signed for by BEY as follows:

SHIPMENT TO:	LEHMAN BROTHERS HOLDING 101 HUDSON ST JERSEY CITY NJ 07302
Shipper Number.....	ASDASD
Tracking Identification Number...	H7278432497

DELIVERYNOTIFICATION

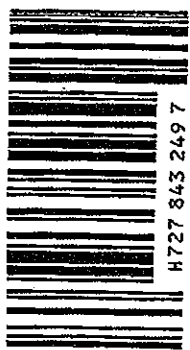
ATTN : JAVIER MAYO
PHONE : 933333333

INQUIRY FROM:
JAVIER MAYO
CAJA DE INGENIEROS
POTOSI 30
BARCELONA 08013



LOS APARTADOS EN ROJO SE UTILIZAN
SOLO PARA ENVÍOS INTERNACIONALES

LOS APARTADOS EN ROJO SE UTILIZAN
SOLO PARA ENVÍOS INTERNACIONALES



CARTA DE PORTE
(No Negociable)

Nº DE SEGUIMIENTO / TRACKING DE LA CARTA DE PORTE

4 OPCION DE SERVICIO II		MATERIAL CUBIERTO US\$ 2.00		MATERIAL CUBIERTO US\$ 2.00	
Express Plus	<input type="checkbox"/>	1+	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Express	<input checked="" type="checkbox"/>	1	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Express Saver	<input type="checkbox"/>	1P	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Expedited	<input type="checkbox"/>	2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Standard XV	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

5 DATOS DEL ENVIO		Peso Real, Dto. Envio (Por Nacional Por US\$ Dto. Envio)		Peso Volumetrico Dto. Envio (Si necesita)	
Nº DE PROYECTO	1				kg
Dto. Envio					kg
				<input type="checkbox"/>	US\$ Express Enclosure

6 SERVICIOS OPCIONALES (consulte las instrucciones)		ENTREGA EN SABADO **		ENTREGA EN SABADO **	
<input type="checkbox"/>		<input type="checkbox"/>		<input type="checkbox"/>	
HERRAMIENTAS ESPECIALES					

7 FECHA DEL ENVIO		FIRMA DEL REMITENTE		FIRMA DEL REMITENTE	
DD	MM	AA			
24	10	09			

El remitente acepta los Términos y Condiciones de UPS detallados al dorso del Empaque para el Remitente de la Carta de Porte. Salvo que se declare un valor superior de transporte en la Carta de Porte, se aplicará el límite de responsabilidad especificado en el Convenio de Varsovia, en el Convenio de Montreal o en el Convenio CITE (según corresponda) o el establecido en la cláusula 9 de los Términos y Condiciones. Los plazos para la reclamación son los establecidos en la cláusula 12. El remitente autoriza a UPS a actuar como agente para el control de la exportación y la tramitación aduanera.

SHIPPER'S COPY

PARA USO DE UPS		Forma		Fecha	
Recupero en 155 Pro		267		21/10/97	
Campana de Escucha		Muestra		Importe	
INFORMACION ADICIONAL		TAMPO		ELECTIVO	

4028621-030035/8 Jan 87

EXHIBIT C

SPA1INA:000A0000

SHIPPER	PKG	TRACKING	ADDRESS	SIGNATURE
NUMBER	ID NO.	NUMBER	(POSTAL OFFICE)	
ASDASD	394	H7284830394	HUDSON ST FL 11 101 JERSEY CITY	

According to our records 1 parcel was delivered on 26/10/09 at 11:03 A.M., and left at MAIL ROOM.
The shipment was signed for by MASI as follows:

SHIPMENT TO:	LEHMAN BROTHERS HOLDING 101 HUDSON ST FL 11 JERSEY CITY NJ 07302
Shipper Number..... ASDASD	Tracking Identification Number... H7284830394

JAVIER MAYO
CAJA DE INGENIEROS
POTOSI 30
BARCELONA 08013

INQUIRY FROM:

DELIVERY NOTIFICATION

ATTN : JAVIER MAYO - H7284830394
PHONE : 933333333



II. Imprescindible para envíos Standard si se selecciona la opción Facturar al destinatario. Ver sección 3.



Disponible para envíos fuera de Europa. Consulte las instrucciones.

SHIPPER'S COPY

1068